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September 10, 2019

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Spectrum Access System Initial Commercial Deployment Proposals (GN Docket No. 15-319)**

Dear Ms. Dortch:

Google LLC (Google) submits the following update to its Initial Commercial Deployment (ICD) proposal, as filed on August 23, 2019.<sup>1</sup> Specifically, we plan to operate ICD deployments consistent with following list. The list refers to page numbers in Annex A of the August 23 filing, which contains additional details of the deployments.

Google, through its Spectrum Access System, plans to support CBRS deployments in the following locations during its ICD reporting period:<sup>2</sup>

[REDACTED]

Additionally, we note that some of our Category A deployments in our ICD proposal show heights that are above 6 m Height Above Average Terrain (HAAT). To clarify, these will be indoor deployments. Any outdoor deployment of CBSDs above 6 m HAAT, regardless of

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<sup>1</sup> See Letter from Megan Anne Stull, Counsel, Google LLC, and Andrew W. Clegg, Spectrum Engineering Lead, Google LLC, to Marlene H. Dortch, Secretary, FCC, in GN Docket No. 15-319 (filed Aug. 23, 2019).

<sup>2</sup> We are actively working with our ICD customers to refine the list, and we will file any updates to this list as soon as possible.

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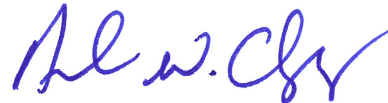
whether the power is within the Category A limit, will be operated as Category B, in accordance with 47 CFR 96.43(a).

Please contact the undersigned if additional information is needed.

Respectfully submitted,



Megan Anne Stull  
Counsel



Andrew W. Clegg  
Spectrum Engineering Lead  
Google LLC